



Information Collection Request for:

**2003 Report to Congress
on
Impacts and Control of Combined Sewer
Overflows
and Sanitary Sewer Overflows**

ICR Number: 2063.01

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title Of The Information Collection

2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows

1(b) Short Characterization/Abstract

The 2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows is being developed to meet a requirement included in the Consolidated Appropriations Act for Fiscal Year 2001, P.L. 106-554. The U.S. Environmental Protection Agency (EPA) Office of Wastewater Management (OWM) will use data from federal sources, state environmental agencies, state and local health departments, and municipalities to determine, summarize, and report the extent of human health and environmental impacts caused by municipal combined sewer overflows (CSOs) and sanitary sewer overflows (SSOs). This Report will also include information on resources spent to address these impacts and an evaluation of the technologies used by municipalities to address these impacts. In addition, this Report will support EPA's SSO Notice of Proposed Rulemaking effort and data integration efforts for the National Pollutant Discharge Elimination System (NPDES) program.

OWM's method for collecting and analyzing the data for CSOs and SSOs from state environmental agencies, state and local health departments, and municipalities is as follows:

- Site visits
- Interviews
- File review
- Phone calls to a subset of publicly owned treatment works (POTWs) and health departments nationwide

The data collected and analyzed for this Report will include the frequency, cause, and location of permitted and unpermitted wastewater discharges, the volume of pollutants discharged, and the constituents discharged; environmental and public health impacts of discharges; the resources spent to address these impacts; and an evaluation of the technologies used to address these impacts.

All data will be stored in a data management system developed by OWM. The data will be used as a cornerstone of the 2003 Report to Congress, giving federal offices, states, municipalities, and the public full access to the data collected both in print and through OWM's website.

The burden for EPA, states, and municipalities to provide, analyze, and review data submitted is a total of 8,245 hours and a cost of \$1,331,233. This burden will occur once, and the collection of information should be completed one-year from the effective date of the ICR. Of the total

portion, the municipal burden is 2,565 hours and \$121,986. The states burden is 3,735 hours and \$185,506. The federal government burden is 1,945 hours and \$1,023,741. Included in the total federal labor cost is contractor support. Contractor support is not included in the federal burden hours. A detailed cost breakdown of federal, state, and municipal burden, including agency and respondent activities, is included in this ICR (Sections 6b, Part i and 6c).

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

OWM needs to obtain data from states and municipalities regarding the human health and environmental impacts from CSOs and SSOs as well as the technologies used to prevent such impacts. As required by the Consolidated Appropriations Act for Fiscal Year 2001, P.L. 106-554, EPA is producing this Report to be submitted to Congress no later than December 15, 2003.

Through the data collection and analysis, EPA, with the assistance of a contractor, will summarize and report on the location of discharges causing such impacts, the volume of pollutants discharged, and the constituents discharged; the resources spent to address these impacts; and the technologies used by municipalities to address these impacts. In addition, this Report will aid OWM's goal of developing better data to support the implementation of the NPDES program.

2(b) Practical Utility/Users of the Data

Information collected during this effort will be used by EPA, states, municipalities, and the general public. EPA program offices will use the data to characterize the extent of human health and environmental impacts caused by sewer overflows, the resources spent to address these impacts, and to evaluate technologies used to control these overflows. EPA program offices will use the data as an indicator of program performance at state and regional levels. States and municipalities will be able to obtain information on current technologies and costs associated with controlling CSOs and SSOs and view efforts being made around the country. The public can use the data to become more knowledgeable about the challenges their communities are facing in controlling sewer overflows and the steps taken to control overflow events.

3. NONDUPLICATION, CONSULTATION, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

The information requested from the respondents is necessary to respond to Congress and is not available from other sources. In order to make this determination, EPA reviewed the existing ICR for the CSO program and found that it did not cover the types of information requested by Congress in P.L. 106-554. There is no current ICR for the collection of information related to SSOs. EPA has also made every reasonable attempt to ensure that the data and information is

not currently available through less burdensome mechanisms.

3(b) Public Notice Required Prior to ICR Submission to OMB

The first notice for the 2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows data collection was published on May 2, 2002, in Federal Register 67 pages 22077-22078 (see attached). In this notice, a 60-day public comment period was solicited.

A second notice will be published in the Federal Register no sooner than July 1, 2002. A 30-day public comment period will be solicited in the second notice.

3(c) Consultations

EPA conducted meetings with representatives of several organizations knowledgeable about the issues being explored in the 2003 Report to Congress. The Association of Metropolitan Sewerage Agencies (AMSA), Water Environment Foundation (WEF), Natural Resources Defense Council (NRDC), and CSO Partnership have all made substantial contributions to the focus and scope of this project. Meetings with these organizations have contributed to EPA's determination that the necessary data does exist, and assisted in developing the methodology that will be used to collect this information. Contact persons from the organizations mentioned are as follows:

AMSA

Greg Schaner, Manager of Government Affairs
1816 Jefferson Place, NW
Washington, DC 20036
Phone: (202) 296-9836; Fax: (202) 833-4657

WEF

Nancy Wheatley, Government Affairs Committee Chair
George Martin, Collection Systems Committee Chair
601 Wythe Street
Alexandria, VA 22314
Phone: (703) 684-2400; Fax: (703) 684-2492

NRDC

Nancy Stoner, Senior Attorney
1200 New York Avenue, NW
Suite 400
Washington, DC 20005
Phone: (202) 289-2394; Fax (202) 289-1060

CSO Partnership

Mark Poland

P.O. Box 51

Richmond, VA 23218

Phone: (804) 775-7736

Other organizations will be invited to submit comments via publication of notices in the Federal Register.

3(d) Effects Of Less Frequent Collection

EPA is requesting the information only once during the data collection period effort to support the development of the Report.

3(e) General Guidelines

Data collection for the 2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows will be in accordance to Paperwork Reduction Act (5 CFR 1320.5 (d)(2)) and adhere to OMB guidelines for data collection.

3(f) Confidentiality

Measures to ensure confidentiality of the data collected (including human health and environmental impacts, locations of discharges, volume of pollutants discharged, and resources spent) are unnecessary. The information submitted voluntarily by regional, state, and municipal respondents is public information.

3(g) Sensitive Questions

Respondents will not be subjected to any sensitive questions (i.e., race, sex, and/or religion) as a result of this ICR.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED**4(a) Respondents/SIC Codes**

Private industries will not be contacted to obtain data for the Report; therefore, SIC codes will not be needed. All information will be provided voluntarily by states and municipalities.

4(b) Information Requested

(i) Data items, including recordkeeping requirements

EPA plans to collect data from state environmental agencies, state and local health departments, and municipalities to support the development of the 2003 Report to Congress. Entities will be requested to report previously collected public data on:

- Frequency, cause, and locations of sewer overflows
- Volume and constituents of pollutants discharged
- Resources spent to address impacts
- Technologies used to address impacts
- Documented human health and environmental impacts from sewer overflows

The data being requested may be found in documents which are over three years old, yet all information is expected to be readily available, if previously collected.

No recordkeeping items will be requested for this Report.

(ii) Respondent Activities

The state and municipal role in assisting this effort will request them to participate in the following:

- Telephone interviews
- File reviews
- Site visits

All information that is being requested is voluntary. Details of their involvement is summarized below.

1) Telephone Interviews

A contractor will contact selected agencies and request to schedule a telephone interview. Interviews typically last from five to thirty minutes. During this time, the respondent may be asked to provide certain documents or additional information at a later date. Information being requested is readily available and requires a minimal effort on the part of the respondent. After the interview, the respondent may be asked to review or verify a summary of the data collected.

2) File Reviews

A team of contractors will visit selected states and municipalities nationwide to gather information requiring a more extensive amount of research or study than possible during a phone interview. The respondent would be asked to arrange access to the documents of interest and assist with any questions that might arise. A minimal amount of effort is required on the part of the respondent. After the review, the respondent may be asked to review or verify an abbreviated

summary of the data collected.

3) Site Visits

A general site visit will consist of several interviews/discussions between EPA staff, a contractor team, and selected respondents at the site as well as file reviews. The interviews are longer than a telephone interview, possibly lasting several hours, and file reviews will be the same as described above. A time commitment of several hours may be required by one or more of the respondents. After the interview, a designated contact may be asked to review or verify a summary of the data collected.

5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

EPA will develop the 2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows based on the data obtained from states and municipalities. As part of this effort, EPA will undertake the following activities:

- Set up a data management system
- Answer respondent questions
- Compile and analyze data
- Reformat and distribute the data
- Store the data

5(b) Collection Methodology and Management

OWM plans to collect data from state environmental agencies, state and local health departments, and municipalities to support the development of this Report. Information collection activities will include: telephone interviews, file review, and site visits, as well as telephone calls to a sample of POTWs and health departments nationwide. Responses to the collection of information is voluntary.

OWM will develop a master data management system populated with information collected from telephone interviews, file reviews, and site visits to selected entities. Information from interviews and file reviews will be initially recorded on paper and stored in files for each state. The data will then be entered and checked for quality assurance by contractor staff, which includes reviewing original documents for clarity and consistency and developing automated database queries to expose inconsistent/questionable data. A crucial step of the QA/QC process includes providing data summaries to the state or municipality from which information was collected for review and comment. The data management system will be maintained in Microsoft ACCESS, but selections will be queried and re-formatted as necessary for each state's review. Once the 2003 Report to Congress is published, a queriable version of the data

management system will be posted on OWM's website (www.epa.gov/npdes) for public access.

5(c) Small Entity Flexibility

In an effort to minimize the data that will need to be collected from small entities, EPA is requesting that states provide any information that has already been entered into a data management system or can be reviewed during contractor site visits. EPA will also provide contractor support to small entities in compiling and analyzing any data.

5(d) Collection Schedule

The collection schedule for the 2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows will be from May 2002 through one-year from the effective date of this ICR. During this time, EPA and its contractor will conduct site visits to states and municipalities as well as meetings of experts and stakeholders. Throughout the data collection, the contractor will utilize EPA, state, and municipal officials to review the information written for this Report including case studies. Following is an in-depth collection schedule for this Report:

State Collection Schedule

Beginning in May 2002 and concluding one-year from the effective date of this ICR, state site visits will be conducted. Each site visit will be approximately three days in length. Permit information from the state's will be collected during the site visits as well as any existing reports or studies detailing the occurrence of CSOs and SSOs and their impacts.

Municipalities Collection Schedule

To collect data from municipalities for the Report, site visits will be conducted beginning in May 2002 and are scheduled to be completed one-year from the effective date of this ICR. Each municipal site visit will be approximately two days in length. Municipal data collection will also include interviews with local health department officials that have collected data related to the human health impacts that are attributable to SSOs and CSOs.

The data collection on the resources municipalities have spent and available plans for future spending will also be completed one-year from the effective date of this ICR. During the telephone interviews and site visits with states and municipalities, the contractor will collect information on the resources involved in controlling CSOs and SSOs. The data collection will seek only information on resources spent or documented plans for future expenditure.

The collected data will be presented in the 2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows. The public will have access to the Report after it has been delivered to Congress. In addition, this Report will also be accessible via the Internet at www.epa.gov/npdes in the winter/spring of 2004.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating the Respondent Burden

The estimated respondent burden associated with documenting the impacts of sewer overflows has been itemized into the following categories: federal, state, and municipal.

The total estimated burden for the information collection is 6,300 hours and a total labor cost of \$307,492. This cost will only be incurred once by all entities and information obtained will be reported by December 15, 2003. The total burden for municipalities is 2,565 hours and \$121,986. State burden is 3,725 hours and \$185,506. Agency burden is 1,945 hours and \$1,023,741. The federal labor costs associated with this Report includes substantial contractor support. Contractor burden hours are not included in this ICR.

Municipal burden include telephone interviews and site visits to collect data on the human health and environmental impacts associated with CSOs and SSOs, along with information related to cost and effectiveness of various controls technologies. Burden incurred by state governments and the Agency also includes telephone interviews and site visits with officials to support the data collection effort, and time spent reviewing draft case studies and the Report sections prepared by contractor.

Burden hour estimates are based on trends observed during previous meetings and file reviews that EPA has conducted for similar reports. States and municipalities will be asked to participate in interviews, facilitate file review by a contractor team, and review summary documents. The agency estimates that a state or municipal representative would spend an average of two to ten hours in meetings/interviews, one to three hours facilitating on-site file reviews, and approximately two hours reviewing summary documents or case studies. Tables 6-1 through Table 6-3, located on page 9 and 10 of this ICR, provide a complete breakdown of burden hours and costs estimates for the states, municipalities and the Agency.

6(b) Estimating Respondent Costs

The total labor cost to collect and provide information for the 2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows over one year is \$307,492.

(i) Estimating Labor Costs

To develop estimated labor costs, EPA used information from the Bureau of Labor Statistics on the average annual salaries for state and municipal personnel involved in “air, water or waste management.” The annual salaries were divided by 2,080 hours to obtain an average hourly wage. An overhead rate of 1.6% was applied to both managerial and administrative salaries to obtain loaded hourly rates.

Tables 6-1 and 6-2 show the total labor hours and costs associated with administrative and management burden for states and municipalities in gathering CSO and SSO information for the one time collection.

TABLE 6-1: STATE BURDEN HOURS AND COSTS

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent				Total State Hours and Cost		
	Technical Hours \$ 54.52	Clerical Hours \$ 37.58	Respondent Hours Per Year	Labor Cost Per Year	Number of Respondent	Total Hours Per Year	Total Cost Per Year
History & Background on Issues Related to the Control of CSOs and SSOs	4.0	0.0	4.0	\$ 218.08	10	40.0	\$ 2,180.80
Characterization of the SSO Problem	25.0	14.0	39.0	\$ 1,889.12	75	2,925	\$ 141,684.00
Characterization of the CSO Problem	1.0	0.0	1.0	\$ 54.52	100	100.0	\$ 5,452.00
Evaluation of Human Health Impacts Attributable to SSOs and CSOs	8.0	0.0	8.0	\$ 436.16	20	160.0	\$ 8,723.20
Evaluation of Environmental Impact Attributable to SSOs and CSOs	8.0	0.0	8.0	\$ 436.16	20	160.0	\$ 8,723.20
Evaluation of Actions to Control CSOs	4.0	1.0	5.0	\$ 255.66	10	50.0	\$ 2,556.60
Assessment of Resources Spent and Planned for CSO Control	8.0	0.0	8.0	\$ 436.16	10	80.0	\$ 4,361.60
Evaluation of Actions to Control SSOs	4.0	1.0	5.0	\$ 255.66	10	50.0	\$ 2,556.60
Assessment of Resources Spent and Planned for SSO Control	8.0	0.0	8.0	\$ 436.16	20	160.0	\$ 8,723.20
Assessment of Benefits for Wet Weather Control Technologies	2.0	0.0	2.0	\$ 109.04	5	10.0	\$ 545.20
SUBTOTAL	Varies	Varies	Varies	\$ 4,526.72	280	3,735	\$ 185,506.40

TABLE 6-2: MUNICIPAL BURDEN HOURS AND COSTS

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent				Total Municipal Hours and Cost		
	Technical Hours \$ 50.95	Clerical Hours \$ 35.13	Respondent Hours Per Year	Labor Cost Per Year	Number of Respondent	Total Hours Per Year	Total Cost Per Year
History & Background on Issues Related to the Control of CSOs and SSOs	2.0	0.0	2.0	\$ 101.90	10	20.0	\$ 1,019.00
Characterization of the SSO Problem	9.0	6.0	15.0	\$ 669.33	50	750.0	\$ 33,466.50
Characterization of the CSO Problem	8.0	2.0	10.0	\$ 477.86	100	1,000	\$ 47,786.00
Evaluation of Human Health Impacts Attributable to SSOs and CSOs	8.0	0.0	8.0	\$ 407.60	20	160.0	\$ 8,152.00
Evaluation of Environmental Impact Attributable to SSOs and CSOs	8.0	0.0	8.0	\$ 407.60	20	160.0	\$ 8,152.00
Evaluation of Actions to Control CSOs	8.0	2.0	10.0	\$ 477.86	10	100.0	\$ 4,778.60
Assessment of Resources Spent and Planned for CSO Control	8.0	0.0	8.0	\$ 407.60	10	80.0	\$ 4,076.00
Evaluation of Actions to Control SSOs	8.0	2.0	10.0	\$ 477.86	10	100.0	\$ 4,778.60
Assessment of Resources Spent and Planned for SSO Control	8.0	0.0	8.0	\$ 407.60	20	160.0	\$ 8,152.00
Assessment of Benefits for Wet Weather Control Technologies	5.0	2.0	7.0	\$ 325.01	5	35.0	\$ 1,625.05
SUBTOTAL	Varies	Varies	Varies	\$ 4,160.22	255	2,565	\$ 121,985.75

(ii) Estimating Capital and Operations and Maintenance Costs

Non-labor costs are not associated with this data collection; therefore, EPA estimates that operations and maintenance costs for this ICR to be zero.

6(c) Estimating Agency Burden and Cost

The development of the Report will require EPA to devote time and resources to data collection and the review of materials prepared by the contractor. The total estimated Agency burden for this effort is 1,945 hours and labor cost is \$1,023,741. The Agency labor cost associated with this Report includes substantial contractor support. Contractor burden hours are not included in this ICR.

To develop labor costs, EPA multiplied the number of hours that will be required to assist in the compilation and collection of data by specific GS rates to generate a cost estimate. Since labor rates vary, EPA used an average hourly rate of \$30.35 (GS-12, step 5) for managerial and an average hourly rate of \$20.93 (GS-9, step 5) for administrative staff. Cost estimates for the Agency were based on the GS pay level for 2001. An overhead rate of 1.6% was applied to both the managerial and administrative salaries to obtain loaded rates of \$78.91 and \$54.41 respectively.

Table 6-3 provides a description of the various activities the Agency is expected to perform as part of the data collection. The table includes the Agency's hours and labor cost per activity.

TABLE 6-3: AGENCY BURDEN HOURS AND COSTS

	Hours and Costs Per Respondent				Other Costs	Total Costs
	Technical Hours \$ 78.91	Clerical Hours \$ 54.41	Total Hours Per Year	Labor Cost Per Year	Contractor Cost Per Year	Total Cost Per Year
INFORMATION COLLECTION ACTIVITY						
History & Background on Issues Related to the Control of CSOs and SSOs	10.0	0.0	10.0	\$ 789.10	\$ 16,351.40	\$ 17,140.50
Characterization of the SSO Problem	675.0	150.0	825.0	\$ 61,425.75	\$ 286,313.65	\$ 347,739.40
Characterization of the CSO Problem	300.0	0.0	300.0	\$ 23,673.00	\$ 198,497.20	\$ 222,170.20
Evaluation of Human Health Impacts Attributable to SSOs and CSOs	255.0	112.5	337.5	\$ 26,243.18	\$ 79,315.20	\$ 105,558.38
Evaluation of Environmental Impact Attributable to SSOs and CSOs	180.0	90.0	270.0	\$ 19,100.70	\$ 69,046.00	\$ 88,146.70
Evaluation of Actions to Control CSOs	40.0	40.0	80.0	\$ 5,332.80	\$ 54,802.80	\$ 60,135.60
Assessment of Resources Spent and Planned for CSO Control	10.0	5.0	15.0	\$ 1,061.15	\$ 25,305.80	\$ 26,366.95
Evaluation of Actions to Control SSOs	40.0	40.0	80.0	\$ 5,332.80	\$ 82,201.60	\$ 87,534.40
Assessment of Resources Spent and Planned for SSO Control	5.0	2.5	7.5	\$ 530.58	\$ 41,849.60	\$ 42,380.18
Assessment of Benefits for Wet Weather Control Technologies	20.0	0.0	20.0	\$ 1,578.20	\$ 24,990.80	\$ 26,569.00
SUBTOTAL	Varies	Varies	Varies	\$ 145,067.25	\$ 878,674.05	\$ 1,023,741.30

6(d) Estimating the Respondent Universe and Total Burden and Costs

EPA estimates that 535 respondents will be needed nationwide to collect the necessary data to develop the 2003 Report to Congress. This estimate includes 280 state respondents and 255 municipal respondents. EPA expects that the total burden to states will be 3,735 hours and total labor cost is \$185,506. Further, EPA expects that the total burden to municipalities will be 2,565 hours at a labor cost of \$121,986.

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

Respondent labor hours will vary according to task; however, EPA is relying on each respondent to support the data collection gathering both administratively and managerially as outlined in Table 6-4. In summary, the breakdown of the state and municipal total labor hours, which is 6,300 is as follows: 3,735 for states and 2,565 for municipalities. The estimated total labor cost for states and municipalities is \$307,492 with states incurring \$185,506 and municipalities incurring \$121,986.

TABLE 6-4: TOTAL RESPONDENT BURDEN

	Number of Respondents	Total Hours Per Year	Total Labor Cost Per Year
State	280	3,735	\$ 185,506.40
Municipal	255	2,565	\$ 121,985.75
TOTAL	535	6,300	\$ 307,492.15

(ii) Agency Tally

The total administrative and managerial labor burden that the Agency will incur is 1,945. The estimated total Agency labor cost is \$1,023,741. Included in the total labor cost is contractor support. Contractor support is not included in the Agency burden hours. The total Agency burden is summarized in Table 6-5.

TABLE 6-5: TOTAL ESTIMATED AGENCY BURDEN

	Total Agency Hours Per Year	Total Agency Labor Cost Per Year	Total Contractor Labor Cost Per Year	Total Labor Cost To Agency Per Year
TOTAL	1,945	\$ 145,067.25	\$ 878,674.05	\$ 1,023,741.30

6(f) Reasons For Change in Burden

There is no reason for change in burden at this time.

6(g) Burden Statement

The total cost for EPA to obtain data for the 2003 Report to Congress on Impacts and Control of Combined Sewer Overflows and Sanitary Sewer Overflows is estimated to be 6,300 labor hours and an estimated cost is \$307,492. The estimate includes labor costs to the state and municipalities. The states and municipalities should not incur any operations and maintenance costs for the data being requested. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Include the EPA ICR number 2063.01 in any correspondence.